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October 26, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York, 10007

Re: *United States v. Lira*, 22-CR-151 (LGS)

Dear Judge Schonfield:

As defense counsel for Eric Lira, I am writing to respectfully request a second amendment to the conditions set out in the letter motion submitted by the Government on May 10, and adopted by this Court on May 11, 2022; and amended by this Court on May 17, 2022, in response to a letter motion submitted by Mr. Lira on May 16, 2022.

Mr. Lira was released in the Western District of Texas on a \$100,000 bond, secured by a corporate surety. The parties agreed to request that your Honor set the same conditions of bail in the Southern District of New York as those set in the Western District of Texas. This was accomplished, as explained above, by the Court's memo endorsement entered May 17, 2022.

Although Mr. Lira was able and willing to hire a second bondsman to post this second bond in the Southern District of New York, we learned (through discussions with his bondsman in El Paso, and the district clerk's office in the Southern District of New York) that there are essentially no bail bondsmen whom he could retain for this purpose. This left Mr. Lira with only the option of posting \$100,000 cash with the district clerk, which he was not financially able to meet.

Because Mr. Lira was not able to obtain the same bond arrangement in the Southern District of New York as he has in the Western District of Texas, as anticipated by the parties; the parties renegotiated a bond. After consultation with Assistant United States Attorney Sarah Mortazavi and Benjamin Gianforti, Mr. Lira has reached an agreement with the Government that it would be appropriate for the Court to order that the bond be set at \$100,000, secured by a deposit of \$50,000 with the Registry of the Court.

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Therefore, it is respectfully requested that the Court amend the first bail condition a second time, as follows:

- \$100,000 bond, secured by cash deposit of \$50,000 in the Registry of the Court.

We have agreed that all other conditions should remain the same as previously ordered.

Respectfully submitted,

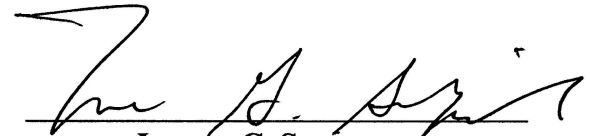


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Cc: Sarah Mortazavi
Benjamin Gianforti,
Assistants United States Attorney
(via ECF)

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 35.

Dated: October 28, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE